



August 22, 2022

Dr. Margie Vandeven, Commissioner
Missouri Department of Elementary and Secondary Education
205 Jefferson St.
Jefferson City, MO 65101

RE: Speech Implementers/SLP-As

Dear Commissioner Vandeven:

On behalf of the American Speech-Language-Hearing Association and the Missouri Speech-Language-Hearing Association (MSHA), we are writing to urge you to allow Speech Implementers who have completed their leveling coursework to become Speech-Language Pathology-Assistants (SLP-As) to contribute fully to the Public School Retirement System (PSRS).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 4,500 ASHA members reside in Missouri.¹

It has come to our attention that Speech Implementers who are members of PSRS and transitioned to an SLP-A position, may have a reduction in the contribution rate if Social Security contributions also apply. The rate of reduction is a two-thirds contribution to PSRS and one-third contribution to Social Security, which would mean a loss in retirement benefits. These individuals have met with their PSRS counselors and determined that, by now contributing to Social Security as well as PSRS, they will be losing a significant amount each month from their retirement benefits than if they had continued to be fully vested in PSRS.

Speech Implementers have personally invested in their coursework to become SLP-As with the understanding that—at the time of enrollment—they would remain fully vested in PSRS. However, due to the changes in their retirement benefits, they are now taking jobs as special education teachers, reading specialists, and early education teachers so that they may continue to fully contribute to PSRS. There are others who are reportedly leaving the education field altogether.

MSHA was contacted by an SLP who shared the following story about their district:

“I have been the only licensed SLP in my district for the past 4 years. I have two Speech Implementers that I have been working alongside during this time. They both spent their evenings and weekends pursuing the leveling coursework to become an SLP-A because they love their job and working with students. They spent their own money to cover the cost of the leveling coursework (approximately \$8,500 in tuition, each). They were told when they started this process that they would continue to be able to contribute fully to

PSRS. They then received notification at the beginning of May 2022 that this would not be the case and they would only be contributing $\frac{2}{3}$ to PSRS and $\frac{1}{3}$ to SS. One of these individuals has been a Speech Implementer for 16 years and was told her monthly retirement benefits would decrease over \$200. Based on the information she was provided, she did not sign her contract to be an SLP-A and instead was hired as a special education teacher. The other individual has been a Speech Implementer 3 years and decided to stick it out a year as an SLP-A for this coming year since she worked so hard on her coursework and feels that's her calling. After this coming school year, she plans to return to the classroom. She has been a teacher for 17 years and has been vested in PSRS for 18 years. These individuals have been vital to the students in our district receiving the speech and language services that they need and are outlined in their IEP. They provide quality multi-tier speech and language interventions, contribute to educational plans, speech therapy, language therapy and communication services through IEP and ISPs in their respective buildings. Currently, our district is having to contract with an outside local SLP or teletherapist."

MSHA has been contacted by other SLPs in a variety of rural school districts via email, phone calls, and in person during its annual convention to share their stories regarding their retirement investments.

The state of Missouri is facing an all-time low in recruiting and retaining school-based SLPs. It is essential for Speech Implementers/SLP-As to be able to contribute fully to PSRS. They have been providing quality services to Missouri students with disabilities for more than 20 years and deserve retirement options that are equitable to other school-based staff.

Thank you for your consideration of this request. If you or your staff have any questions, please contact Jeffrey P. Regan, ASHA's Chief Advocacy Officer, at jregan@asha.org or Lynette Cowherd, MSHA's President-Elect at cldcfamily@gmail.com.

Sincerely,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

Lynette Cowherd M.S. CCC/SLP
MSHA President-Elect

cc:

Missouri Department of Elementary and Secondary Education

- Stephen Barr, Assistant Commissioner
- Beverly Luetkemeyer, Director, Special Education Compliance
- Dana Welch, Assistant Director, Special Education Compliance

Public School and Education Employee Retirement Systems of Missouri

- Nicole Hamler, Director of Member Services
- Sarah Swoboda, General Counsel
- Michael Moorefield, Legislative Director
- Stacie Verslues, Director of Employer Services

¹ American Speech-Language-Hearing Association. (2022). *Missouri* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/missouri-state-flyer.pdf>.